



clinched and said he wanted to fight Officer McLemore.

4. Officers McLemore and Gadson attempted to get Coleman to calm down.

5. Coleman refused to follow orders and continued to act in an aggressive manner.

6. Officer McLemore then sprayed Coleman with Saber Red chemical spray.

7. After being sprayed, Coleman began to swing his arms and fists wildly at the officers.

8. Officer McLemore used palm heel strikes to Coleman's facial area in order to stop Coleman's aggression.

9. Officer Gadson and McLemore took Coleman to the floor and hand cuffed Coleman to the rear.

10. Coleman was taken to the infirmary where he was treated for contusions to his forehead, scratches and a contusion behind his left ear and a small contusion behind his right ear.

11. Coleman was seen by medical staff a second time that day and told medical staff he was beat up by the police but did not identify who the "police" were.

12. Captain Caldwell investigated the use of force by Officers McLemore and Gadson and determined that the use of force was justified given Coleman's

aggression.

13. Officer Speaks was not mentioned in any of the incident reports.

### **DEFENDANTS' WITNESS LIST**

<b>Name/Address</b>	<b>Subject of Knowledge</b>
Zachary McLemore (Defendant) c/o J. Matt Bledsoe 501 Washington Avenue Montgomery, Alabama 36130	Officer McLemore will testify regarding his knowledge of the incident that occurred on April 15, 2019.
Joe L. Binder (Defendant) c/o J. Matt Bledsoe 501 Washington Avenue Montgomery, Alabama 36130	Officer Binder will testify regarding his knowledge of the incident that occurred on April 15, 2019.
Keller Speaks (Defendant) c/o J. Matt Bledsoe 501 Washington Avenue Montgomery, Alabama 36130	Officer Speaks will testify regarding his knowledge of the incident that occurred on April 15, 2019.
Roderick Gadson (Defendant) c/o J. Matt Bledsoe 501 Washington Avenue Montgomery, Alabama 36130	Officer Gadson will testify regarding his knowledge of the incident that occurred on April 15, 2019.
Captain Shannon Caldwell (Investigating Officer) c/o J. Matt Bledsoe 501 Washington Avenue Montgomery, Alabama 36130	Captain Caldwell will testify regarding his knowledge of the incident that occurred on April 15, 2019.
William Patrick (Sgt.) c/o J. Matt Bledsoe 501 Washington Avenue Montgomery, Alabama 36130	Sgt. Patrick will testify regarding his knowledge of the incident that occurred on April 15, 2019.

Name/Address	Subject of Knowledge
Clinton Thrasher (Lieutenant) c/o J. Matt Bledsoe 501 Washington Avenue Montgomery, Alabama 36130	Lt. Thrasher will testify regarding his knowledge of the incident that occurred on April 15, 2019.
Deaundra Johnson (Captain) c/o J. Matt Bledsoe 501 Washington Avenue Montgomery, Alabama 36130	Captain Johnson will testify regarding his knowledge of the incident that occurred on April 15, 2019.
Jackie Pedigo (LPN) c/o Phil Piggott Webster Henry Bradwell Cohan Speagle & DeShazo, P.C. 2 Perimeter Park South Suite 445 East Birmingham, AL 35243	Nurse Pedigo will testify regarding his knowledge of the incident that occurred on April 15, 2019.
Any witness listed on Plaintiff's Witness List	
Any witness needed for impeachment or rebuttal purposes.	

### DEFENDANTS' EXHIBIT LIST

1.	Incident Report dated April 15, 2019;
2.	Inmate Body Chart dated April 15, 2019 at 11:28 a.m.;
3.	Inmate Body Chart dated April 15, 2019 at 8:00 p.m.;
4.	Inmate Written Statement dated April 15, 2019;
5.	Inmate Medical Records;

6.	Inmate Mental Health Records;
7.	Rebuttal documents.

Respectfully submitted,

STEVE MARSHALL  
ATTORNEY GENERAL

/s/ J. Matt Bledsoe  
J. MATTHEW BLEDSOE  
Assistant Attorney General  
Attorney for Defendants

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### **CERTIFICATE OF SERVICE**

I hereby certify that I have on July 12, 2021, electronically filed the foregoing Defendants' Pre-Trial Narrative Statement with the Clerk of Court using the CM/ECF system which will provide notice and a copy to the following:

Richard Rice  
The Rice Law Firm LLC  
420 20th Street North Suite 2000  
Birmingham, AL 35201

/s/ J. Matt Bledsoe  
J. MATT BLEDSOE  
Assistant Attorney General